

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA,	§	
Petitioner,	§	
	§	
v.	§	Civil Action No. A-14-CV-645 SS
	§	
AN AGGREGATED TOTAL OF \$512,894.00,	§	
MORE OR LESS, IN UNITED STATES	§	
CURRENCY,	§	
	§	
2012 VOLKSWAGEN PASSAT,	§	
VIN: 1VWBN7A30CC068407,	§	
	§	
BITCOIN ACCOUNT, WALLET ADDRESS:	§	
1LMwVh5mXTkUfpJmqrLc4zfga9y2iYChgi,	§	
CONTAINING 164.57107207 bitcoins,	§	
	§	
BITCOIN ACCOUNT, WALLET ADDRESS:	§	
1KasRGy5K1rW8Yxf66S4tBRipBJzMX67Ly,	§	
CONTAINING 28.988387 bitcoins, and	§	
	§	
ROYAL SOVEREIGN INTERNATIONAL	§	
MONEY COUNTER, MODEL RBC-1003BK,	§	
SERIAL #K1207LA09668,	§	
Respondents.	§	

**UNITED STATES’ MOTION TO UNSEAL APPENDIX A, ENTITLED
“FACTS PERTINENT TO VIOLATIONS IN SUPPORT OF
VERIFIED COMPLAINT FOR FORFEITURE”**

NOW COMES Petitioner United States of America (“the United States”), by and through the Acting United States Attorney for the Western District of Texas, and files this Motion to Unseal Appendix A, entitled “Facts Pertinent to Violations in Support of Verified Complaint for Forfeiture.” In support thereof, the United States respectfully offers the following:

I.

On July 10, 2014, the United States filed a Verified Complaint for Forfeiture (Doc. 1) and an *Ex Parte* Application to File Under Seal Appendix A (Doc. 2). On July 14, 2014, the Court

granted the United States' request to seal Appendix A, entitled "Facts Pertinent to Violations in Support of Verified Complaint for Forfeiture." (Doc. 3).

II.

The unsealing of Appendix A filed in this instant cause of action will no longer compromise any pending law enforcement investigation, and there is no need to maintain the above-referenced pleading under seal.

ACCORDINGLY, Petitioner United States of America respectfully moves this Honorable Court to order the Clerk of Court to unseal Appendix A, entitled "Facts Pertinent to Violations in Support of Verified Complaint for Forfeiture." The United States of America also seeks such other and further relief this Honorable Court deems just and proper.

Respectfully submitted,

RICHARD L. DURBIN, JR.
Acting United States Attorney

By: /s/ Daniel M. Castillo
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ATTORNEYS FOR PETITIONER,
UNITED STATES OF AMERICA

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of February 2015, a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System which will transmit notification of such filing to the following CM/ECF participant:

Service is not applicable as there are no parties to be notified or served with this filing.

/s/ Daniel M. Castillo

DANIEL M. CASTILLO

Assistant United States Attorney

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**ORDER TO UNSEAL APPENDIX A, ENTITLED
“FACTS PERTINENT TO VIOLATIONS IN SUPPORT OF
VERIFIED COMPLAINT FOR FORFEITURE”**

Petitioner United States of America has moved this Court to Unseal Appendix A, entitled Facts Pertinent to Violations in Support of Verified Complaint for Forfeiture, and the Court having considered the same and being duly and fully apprised in all its premises is of the opinion that said Motion is meritorious and shall be, and hereby is, in all things GRANTED; IT IS THEREFORE,

ORDERED that the Clerk of Court shall unseal Appendix A, Facts Pertinent to Violations in Support of Verified Complaint for Forfeiture in the instant case.

SIGNED this _____ day of _____, 2015.

SAM SPARKS
UNITED STATES DISTRICT JUDGE